

To: [Nonresponsive based on revised scope]@erllc.com]; Wagner, Christine[Wagner.Christine@epa.gov]
From: Fitzsimmons, Charlie[O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=9607A6C450264F67A94A0E6C37997D82-CFITZSIM]
Sent: Fri 12/13/2019 5:34:23 PM (UTC)
Subject: RE: [EXT]RE: US EPA Region 3/ Shiloh Church Road Site Analytical Review

So it looks like a minimum of 4 grab samples (assuming 2000cy total) and then the composite? If ok with Chris.

Charles Fitzsimmons, OSC
**USEPA Region 3
Environmental Science Center
SEAD-Preparedness and Response Branch
701 Mapes Rd
Ft. Meade, Md 20755
443.223.9774 (m)**

From: [Nonresponsive based on revised scope]@erllc.com>
Sent: Friday, December 13, 2019 11:50 AM
To: Wagner, Christine <Wagner.Christine@epa.gov>; Fitzsimmons, Charlie <Fitzsimmons.Charlie@epa.gov>
Subject: FW: [EXT]RE: US EPA Region 3/ Shiloh Church Road Site Analytical Review

Chris and Charlie,
Morning.
Please see message below from EnviroSAFE on the sampling we would need to do to verify there are no Dioxins.

[Nonresponsive based on revised scope]

From: [Nonresponsive based on revised scope]@envirosafeservices.com>
Sent: Friday, December 13, 2019 11:17 AM
To: [Nonresponsive based on revised scope]@awmsi.com>; [Nonresponsive based on revised scope]@envirosafeservices.com
Cc: [Nonresponsive based on revised scope]@erllc.com>; [Nonresponsive based on revised scope]@awmsi.com>
Subject: [EXT]RE: US EPA Region 3/ Shiloh Church Road Site Analytical Review

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[Redacted]

What is the volume of each grid? Ohio EPA, in instances such as this, has required EnviroSAFE to obtain data every 250 tons or cubic yards (assuming a 1:1 ratio). The samples for the dioxins should be grab samples. You may use one composite sample for the missing constituents.

If you have any questions regarding the above please do not hesitate to contact me.

Sincerely,

[Redacted]

[Nonresponsive based on revised scope]

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From: Nonresponsive based on revised scope <[REDACTED]@awmsi.com>

Sent: Friday, December 13, 2019 11:07 AM

To: Nonresponsive based on revised scope <[REDACTED]@envirosafeservices.com>

Cc: Nonresponsive based on revised scope <[REDACTED]@envirosafeservices.com>; Nonresponsive based on revised scope <[REDACTED]@erllc.com>; Jim Smith <jsmith@awmsi.com>

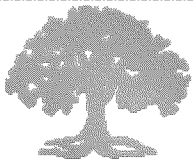
Subject: RE: US EPA Region 3/ Shiloh Curch Road Site Analytical Review

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[REDACTED] with ER (copied) is going to try to isolate the section of the pile containing the dioxins. He will divide the pile into 4 grids and resample for dioxins only. Also, the lab will be able to report the missing data you identified below.

Please let us know if the additional dioxin only data along with the existing data would be ok or if you would require additional analysis per each grid. Also, should the sample be a composite of grab from each grid?

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From: Nonresponsive based on revised scope <[REDACTED]@envirosafeservices.com>

Sent: Tuesday, November 26, 2019 10:13 AM

To: Nonresponsive based on revised scope <[REDACTED]@awmsi.com>

Cc: Nonresponsive based on revised scope <[REDACTED]@envirosafeservices.com>

Subject: US EPA Region 3/ Shiloh Curch Road Site Analytical Review

Good Morning [REDACTED]

As we discussed yesterday afternoon, we reviewed the additional analysis provided for the subject project to determine applicable UHC's. 1,2,3,4,6,7,8,9-Octachlorodibenzo-p-dioxin (OCDD) exceeds 40 CFR 268.49 alternate treatment standards for soils. The result for 1,2,3,4,6,7,8,9-Octachlorodibenzo-p-dioxin (OCDD) is 149000 ng/Kg (0.149 mg/Kg). The 40 CFR 268.48 Universal Treatment Standard for 1,2,3,4,6,7,8,9-Octachlorodibenzo-p-dioxin (OCDD) is 0.005 mg/kg and the 40 CFR 268.49 alternate treatment standard for soil is 0.05 mg/Kg. Based on the analytical result provided for 1,2,3,4,6,7,8,9-Octachlorodibenzo-p-dioxin (OCDD), EnviroSAFE will not be able to accept this waste, unless the generator can isolate the area from which the sample was taken and provide data on the remaining soils that evidence 1,2,3,4,6,7,8,9-Octachlorodibenzo-p-dioxin (OCDD) meets 40 CFR 268.49 alternate treatment standards for soil.

I will put the profile on hold until we hear from you whether or not the customer would like to continue to pursue an approval for this project. If the customer would like to proceed then in addition to providing additional analysis for 1,2,3,4,6,7,8,9-Octachlorodibenzo-p-dioxin (OCDD), the following items will also need addressed:

No analytical data was provided for the following constituents to verify whether or not these constituents should be declared as UHCs:

- o Cyclohexanone (TCLP)
- o Di-n-propylnitrosamine
- o Diphenylnitrosamine
- o Ethyl Cyanide/Propanenitrile
- o Ethyl methacrylate
- o Ethylene oxide
- o Phthalic acid

Based on all the analysis provided, the following constituent should be declared as UHCs:

- o 1,2,3,4,6,7,8-HpCDD
- o HxCDDs (All Hexachlorodibenzo-p-dioxins)
- o HxCDFs (All Hexachlorodibenzofurans)
- o 1,2,3,4,6,7,8,9-Octachlorodibenzo-p-dioxin (OCDD)
- o 1,2,3,4,6,7,8,9-Octachlorodibenzofluran (OCDF)
- o Total PCBs

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